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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PHILIP GOLUBOWSKI, INDIVIDUALLY  
AND ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Plaintiff,

v.

ROBINHOOD MARKETS, INC. ET AL.,

Defendants.

CASE NO. 3:21-CV-09767-EMC

**STIPULATION RE CASE  
MANAGEMENT CONFERENCE  
AND [PROPOSED] ORDER**

1 Plaintiff Philip Golubowski (“Plaintiff”) and Defendants Robinhood Markets, Inc.  
2 (“Robinhood”); Vladimir Tenev, Jason Warnick, Baiju Bhatt, Jan Hammer, Paula Loop, Jonathan  
3 Rubenstein, Scott Sandell, Robert Zoellick (together with Robinhood, the “Robinhood Defendants”);  
4 and Goldman Sachs & Co. LLC, J.P. Morgan Securities LLC, Barclays Capital Inc., Wells Fargo  
5 Securities, LLC, Mizuho Securities USA LLC, JMP Securities LLC, KeyBanc Capital Markets Inc.,  
6 Piper Sandler & Co., Rosenblatt Securities Inc., BMO Capital Markets Corp., BTIG, LLC, Santander  
7 Investment Securities Inc., Academy Securities, Inc., Loop Capital Markets LLC, Samuel A. Ramirez &  
8 Company, Inc., and Siebert Williams Shank & Co., LLC (the “Underwriter Defendants,” and together  
9 with the Robinhood Defendants, the “Defendants”) by and through their counsel of record jointly  
10 stipulate as follows:

11 WHEREAS, the December 22, 2021 initial case scheduling order (“Scheduling Order”) set an  
12 initial case management conference for March 22, 2022, and, further established deadlines of 21 days  
13 before the conference for the parties to file ADR Certifications and to meet and confer regarding initial  
14 disclosures, early settlement, ADR process selection, and a discovery plan, *see* ECF No. 7;

15 WHEREAS, the Scheduling Order further provided that, if the initial case management  
16 conference is continued, then the relevant deadlines set forth therein would be continued for the same  
17 period of time;

18 WHEREAS, the Private Securities Litigation Reform Act (the “PSLRA”) provides that: (1)  
19 the plaintiff who files a securities class action shall publish notice to the purported class within 20  
20 days of filing the action informing the class members of their right to seek appointment as lead  
21 plaintiff; (2) not later than 60 days after the date on which the notice is published, any member of  
22 the purported class may move the court to serve as lead plaintiff of the purported class; and (3) the  
23 Court shall appoint lead plaintiff and lead counsel. See 15 U.S.C. § 77z-1(a)(3)(A) & (B);

24 WHEREAS, a hearing on multiple motions to appoint the lead plaintiff and lead plaintiffs’  
25 counsel is presently noticed for March 24, 2022;

WHEREAS, the parties agree and stipulate that, in the interests of judicial efficiency, the March 22, 2022 initial case management conference and associated deadlines should be continued until after the Court has appointed lead plaintiffs' counsel;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. The initial case management conference currently scheduled for March 22, 2022 should be vacated and rescheduled for a date after the Court has ruled on the pending motions related to the appointment of lead plaintiffs' counsel.
2. Within 10 court days after the entry of any order by the Court appointing lead counsel, the parties shall meet and confer and shall submit a stipulation setting a date for an initial case management conference and all deadlines associated therewith.

DATED: March 1, 2022

Respectfully submitted,

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**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: March 1, 2022

s/ Mark R. Conrad  
MARK R. CONRAD

**[PROPOSED] ORDER**

Pursuant to stipulation, initial case management conference scheduled for March 22, 2022, together with all deadlines set by the Court's order scheduling the conference, are hereby VACATED. Within 10 court days after the entry of any order by the Court resolving the pending motions to appoint lead counsel in this matter, the parties shall meet and confer and shall submit a stipulation setting a date for an initial case management conference and all deadlines associated therewith.

**IT IS SO ORDERED.**

Dated: March \_\_, 2022

\_\_\_\_\_  
HONORABLE JUDGE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE